

To: Kowalski, Craig (NFK)[craig.kowalski@MassMail.State.MA.US]
From: Khan, Annie (DPH)
Sent: Fri 4/22/2011 4:13:34 PM
Subject: RE: Predicate questions with answers

[REDACTED].doc

Welcome. Bad habit of writing in red when I do corrective action on chemist's work for QC/QA.

See attachment for an updated version of the predicate questions: I change the wording of question # 35 and eliminated what was question # 37. I edited these to avoid potential problems from the d/c.

Dan was the confirmatory chemist. His role was to compare the unknown sample to a known standard. We perform confirmatory test because we require reviewable data. I can state that because I am trained in GC/MS (confirmatory test), I can review the documents form my opinion to those findings. It has worked in my previous cases.

We leave that decision up to the ADA, if d/c and the judge has no objections, I can testify to everything. You call the shots. I would suggest to have me testify to everything and see how it goes. But I will still bring Dan just incase. Worst case, he is not needed and I buy him donuts. Haha.

Have a nice weekend as well.

Annie

-----Original Message-----

From: Kowalski, Craig (NFK)
Sent: Friday, April 22, 2011 9:00 AM
To: Khan, Annie (DPH)
Subject: RE: Predicate questions with answers

Annie,

Well! Thank you, thank you, thank you! I wish every witness would do the same and send me back their answers in red.

After reading through that, do I really need Dan? Can you explain to me his role?

Have a great weekend and see you next week. I'll contact you after I get started on Tuesday to confirm the Thursday at 9 time.

Best, Craig

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-----Original Message-----

From: Khan, Annie (DPH)
Sent: Thursday, April 21, 2011 10:49 PM
To: Kowalski, Craig (NFK)
Subject: Predicate questions with answers

See attachment for the predicate question with my answers.

Avoid questions that deal with: accreditation, publications and external training.

Additional questions that may help build creditability(at least in my experience):

Have you ever testified before?
If so, approximately how many times and which courts?

Hope this helps. Let me know if I need to clarify or expand on any particular topics.

PS: Debi and George knows how to find me.

Annie